

IN THE CHANCERY COURT FOR DAVIDSON COUNTY, TENNESSEE  
FOR THE TWENTIETH JUDICIAL DISTRICT AT NASHVILLE

---

STATE OF TENNESSEE,  
Petitioner,

v.

HERITAGE HOUSE, INC., a Tennessee  
corporation

Respondent.

---

**PETITION**

---

Paul G. Summers, Attorney General and Reporter for the State of Tennessee, (hereinafter "Attorney General"), files this Petition pursuant to Tenn. Code Ann. § 47-18-107 of the Tennessee Consumer Protection Act of 1977 (hereinafter "the Act"), and would respectfully show the Court as follows:

1. The Attorney General, acting pursuant to the Act, has investigated certain acts and practices of Heritage House, Inc. (hereinafter, "Respondent"). Upon completion of such investigation, the Attorney General has determined that certain of Respondent's acts and practices, more specifically described in Paragraph 2 of this Petition, constitute unfair and deceptive acts or practices affecting the conduct of trade or commerce in the State of Tennessee in violation of Tenn. Code Ann. § 47-18-101 et seq. ( the Tennessee Consumer Protection Act). More specifically, Respondent's conduct is violative of Tenn. Code Ann. §§ 47-18-104(a), (b)(5), (b)(12) and (b)(27).

2. Based upon the investigation of Respondent, the Attorney General alleges the following:

(A) Respondent is a Tennessee corporation. Respondent offers for sale to consumers certain collectible items such as music boxes.

(B) Collectible items are marketed by the Respondent to include "certificates of authenticity". Some of these "certificates of authenticity" include a silver embossed notary seal containing the following: "Gordon Denney," "Notary Public at Large," and "State of Tennessee." The certificates are not in fact notarized in accordance with legally accepted standards. For example, Gordon Denney was never a notary public at large commissioned by the State of Tennessee. Additionally, the document is merely a photocopy of the president's signature, each certificate has not been logged into a notary log, and the notary's commission expiration date is not provided.

(C) Respondent's conduct constitutes unfair and deceptive acts or practices.

3. Respondent neither admits nor denies the allegations of Paragraph 2 (A-C).

4. The Attorney General entered into negotiations with Respondent and the parties have agreed to, and the Division has approved, the attached Assurance of Voluntary Compliance.

5. In accordance with the provisions of Tenn. Code Ann. § 47-18-107(c), the execution, delivery and filing of the Assurance does not constitute an admission of prior violation of the Act.

6. The Division, the Attorney General, and the Respondent, the parties who are primarily interested in the matters set forth in Paragraph 2 hereof, have jointly agreed to the Assurance of Voluntary Compliance and join in its filing.

PREMISES CONSIDERED, Petitioner prays

1. That this Petition be filed without cost bond pursuant to the provisions of Tenn. Code Ann. §§ 20-13-101 and 47-18-116.

2. That the Assurance of Voluntary Compliance be approved and filed in accordance with the provisions of the Tennessee Consumer Protection Act.